16-10123-smb Doc 28 Filed 02/08/16 Entered 02/08/16 15:48:15 Main Document Pg 1 of 6

WINDELS MARX LANE & MITTENDORF, LLP Hearing Date: February 11, 2016 at 10:00 a.m.

Attorneys for Alan Nisselson, Chapter 7 Trustee

156 West 56th Street

New York, New York 10019

Tel. (212) 237-1000 / Fax. (212) 262-1215

Attorneys Appearing: Howard L Simon (hsimon@windelsmarx.com)

Leslie S. Barr (lbarr@windelsmarx.com)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 7

NARCO FREEDOM, INC.,

Case No. 16-10123-smb

Debtor.

TRUSTEE'S REPLY TO OBJECTION OF JASON BRAND AND IN FURTHER SUPPORT OF MOTION FOR AUTHORITY (A) PURSUANT TO 11 U.S.C. § 721 TO OPERATE THE DEBTOR'S BUSINESS ON A LIMITED BASIS, AND (B) IN CONNECTION THEREWITH, ON AN INTERIM BASIS, TO IMMEDIATELY (i) EMPLOY THE TEMPORARY RECEIVER, HER REMAINING STAFF MEMBERS AND COMPUTER CONSULTANT PURSUANT TO 11 U.S.C. § 363, AND (ii) RETAIN THE TEMPORARY RECEIVER'S COUNSEL AS SPECIAL COUNSEL TO THE TRUSTEE PURSUANT TO 11 U.S.C. §§ 327(e)

TO THE HONORABLE STUART M. BERNSTEIN, UNITED STATES BANKRUPTCY JUDGE:

Alan Nisselson (the "**Trustee**"), the interim Chapter 7 Trustee of Narco Freedom, Inc. (the "**Debtor**"), by his general counsel, Windels Marx Lane & Mittendorf, LLP ("**Windels** Marx"), respectfully submits this reply to the objection of Jason Brand ("**Brand**" and the "**Brand Objection**") and in further support of the Trustee's motion to operate on a limited basis and related relief, including the employment of Lori Lapin Jones (the "**Receiver**") and retention of Garfunkel Wild ("**GW**") (the "**Motion**").

{11174313:2}

¹ The Brand Objection is titled "Motion in Opposition to the Trustee's Order to Show Cause to Continue to Employ the Temporary Receiver and her Counsel, Garfunkel Wild, under this Voluntary Filing of the Bankruptcy as should be Excused under Section 543(d) subject to the Below Supporting Facts. The Brand Objection was filed as an adversary proceeding against Narco Freedom, Adv. Pro. No. 16-01017. [Docket No. 1].